

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOSE VELEZ,

**NOTICE OF MOTION**

Plaintiff,

- against -

15-cv-7441 (VEC)

NYPD POLICE OFFICER MICHAEL O'BRIEN, Shield  
No. 22886 of the 9th Precinct, NYPD POLICE OFFICER  
PAUL JURGENS, Shield No. 23820, and JOHN DOE  
POLICE OFFICERS 1-5,

Defendants.

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PLEASE TAKE NOTICE, that upon the annexed declaration of Matthew E. Stein, Esq., dated May 8, 2017, the exhibits thereto, the memorandum of law submitted herewith, and upon all prior pleadings and proceedings had herein, defendants O'Brien and Jurgens will move this Court, Valerie E. Caproni, at the Courthouse, 40 Foley Square, Manhattan, NY, on a date and time to be determined by the Court, for an order granting defendants' motion *in limine*, and for such other and further relief as the Court deems just and proper.

Dated:           New York, New York  
                  May 15, 2017

ZACHARY W. CARTER  
Corporation Counsel of the City of New York  
*Attorney for Defendant City of New York*  
100 Church Street  
New York, New York 10007  
(212) 356-2105

By:               \_\_\_\_\_  
                  /s/  
                  Matthew E. Stein, Esq.

VIA ECF

Ryan Lozar, Esq.

*Attorney for Plaintiff*

Law Office of Ryan Lozar

305 Broadway, 9<sup>th</sup> Floor

New York, NY 10007